BEFORE THE HEARING PANEL IN TIMARU

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of the hearing of submissions in relation to the Proposed Timaru District Plan

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STATEMENT OF PRIMARY EVIDENCE OF FRAZER JAMES MUNRO ON BEHALF OF PRIMEPORT TIMARU LIMITED AND TIMARU DISTRICT HOLDINGS LIMITED

HEARING STREAM A
PART 1 – INTRODUCTION AND GENERAL PROVISIONS
GENERAL DEFINITIONS
HIGH LEVEL STRATEGIC DIRECTIONS

Dated: 22 April 2024

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EXECUTIVE SUMMARY

1. My full name is Frazer James Munro. I am the General Manager of Timaru District Holdings Limited (**TDHL**).

2. My evidence relates to the submissions and further submissions of PrimePort and TDHL on the Proposed Timaru District Plan (**Proposed Plan**).

3. While I understand that the definitions of "*Lifeline Utility" and* "*Regionally Significant Infrastructure"* are not the subject of this hearing, Strategic Directions objective SD-08 refers to and recognises the importance of the Port through these defined terms.

4. By way of introduction to the Port and its activities, and their recognition in the Strategic Directions objectives, I provide evidence on the value of the Port to the District and Region and the vital role it and its supporting and related activities in the Special Purposes Port Zone (**PORTZ**) play in supporting the local economy.

5. I also comment on the importance of amending Strategic Directions objective SD-O10 so that the enablement of public access to and along the coastal marine area does not apply within the PORTZ where access restrictions are appropriate for health and safety, New Zealand Customs Service and Ministry of Agricultural and Fisheries (**MAF**) regulatory reasons.

6. I consider it vital for ongoing operations of the Port and its supporting and related activities to have the regulatory flexibility, ability and certainty to carry out approved activities, including to develop, relocate, expand, upgrade, or otherwise change permitted activities within the PORTZ without being compromised by the establishment of sensitive activities in the meantime. I support amendments recommended by Ms Seaton to the "reverse sensitivity" definition, to better protect current and future Port and supporting activities in the PORTZ.

INTRODUCTION

7. My full name is Frazer James Munro. I am the General Manager of TDHL and have held this role since September 2020. In this role, I report to the TDHL Board of Directors and am responsible for all aspects of the

company. Of relevance to this evidence is the direct management of the property within the PORTZ including the 44 commercial and industrial tenants that occupy the TDHL portfolio. This also includes working closely with the PrimePort executive and staff at an operational level.

8. Prior to this role, from 2017 to 2020, I was the Timaru District Council Development Manager responsible for managing the interface and relationships between Council and the external development and business sector.

9. TDHL is a Council Controlled Trading Organisation in accordance with Section 6 of the Local Government Act 2002 and is 100% owned by Timaru District Council (**TDC**). TDHL owns 39 hectares of land in the PORTZ (not being the operational Port land) and is a 50% shareholder of PrimePort Timaru Limited (**PrimePort**).

10. My qualifications include a Batchelor of Science from Otago University, a Batchelor Spatial Science (Hons) from the University of Southern Queensland and a Graduate Diploma of Business Studies from Massey University. I am a full member of Survey and Spatial New Zealand and hold a current practicing certificate from the Cadastral Surveyors Licensing Board of New Zealand.

11. I have prepared this statement of evidence on behalf PrimePort and TDHL in respect of matters arising from PrimePort's and TDHL's submissions and further submissions on the Proposed Plan.

12. I am authorised to provide this evidence on behalf of both PrimePort and TDHL.

Scope of evidence

13. My evidence relates to those parts of the submissions and further submissions of PrimePort and TDHL on the Proposed Plan that relate to Hearing Stream A, and which collectively:

    (a) Support Objective SD-O8(iv) in the Strategic Directions chapter which:

        (i) specifically recognises the benefits of Regionally Significant Infrastructure and Lifeline Utilities; and

(ii) enables their safe, efficient and effective establishment, operation, maintenance, renewal, upgrading and development, while managing adverse effects appropriately, including reverse sensitivity effects.

(b) Seek amendment to Strategic Objective SD-O8 to explicitly recognise reverse sensitivity effects.

(c) Partly oppose Objective SD-O10 in the Strategic Directions chapter to the extent that it does not exclude the Port of Timaru from the provision of public access to and along the coastal marine area.

(d) Support an amendment to the definition of "reverse sensitivity" to include the future permitted development or expansion of that activity.

14. My evidence will outline:

(a) The strategic and regional significance of the Port and the PORTZ.

(b) The current activities of the Port, and in the PORTZ.

(c) Anticipated future activities of the Port, and in the PORTZ.

(d) An overview of operational issues and impacts arising from the Proposed Plan.

STRATEGIC AND REGIONAL SIGNIFICANCE OF THE PORT AND THE PORT ZONE

Timaru Port – Strategic Significance

15. The Port of Timaru is located immediately adjacent to the Timaru township on the South Canterbury bight; midway between the Port of Lyttelton (175km north of Timaru) and Port Chalmers (195 km south of Timaru).

16. The Port today is a 70+ Ha site (land + harbour). It is a man-made (artificial) structure comprising concrete block and armour rock breakwaters constructed to protect an inner and outer harbour which includes six wharves ranging in length from 200m to 450 m in length. **Photo 1** below shows an aerial view overlooking the Port from the north, looking southward toward Patiti Point in the distance.

Photo 1 – Aerial view of the Port and PORTZ looking southward.

17. Work on the first port structures commenced in the 1860s with the construction of the #1 wharf concrete quay/breakwater which resulted in an immediate build-up of cobbles and gravel along south beach. The construction of further breakwaters along the south shore area ultimately created the reclaimed land that today includes the PORTZ south of the Port (the whole zone is an estimated 100Ha).

18. Over time, much of this land was owned and developed by the Port to create port-related infrastructure including railway sidings, warehousing, container storage facilities, fishing industry related infrastructure, fuel and other bulk liquid storage. In 2014, land outside of the Port operating area still owned by PrimePort was transferred to TDHL as part of the Port restructuring. This land is within the PORTZ and remains vital for the efficient operation of the Port. **Attachment 1** to this evidence shows the distribution of PrimePort and TDHL-owned land within the PORTZ.

19. The original decision to construct a port in South Canterbury was in response to the growing need for a safe mooring for ships transporting passengers and cargoes needed to support the rapidly growing Timaru and South Canterbury economy and provide a direct shipping link to the rest of New Zealand and the world. Today the purpose of PrimePort Timaru Ltd has a global focus “Connecting our Region to the World”.

20. The total value of food and fibre exports from South Canterbury was estimated to be $3.9 billion in 2022, with $3 billion of this coming from Timaru District with a large portion of these exports being through the Port.[1] The main contributors (94%) being dairy, meat and wool and seafood and aquaculture.

21. It is worth noting that Statistics NZ records the value of exports from PrimePort Timaru as $1.1 billion in 2021. However, this only includes exports listing PrimePort Timaru as their final New Zealand port before shipment overseas, whereas many exports leaving PrimePort transit through another New Zealand port before final export. The real export value from the Port is therefore somewhere between these two figures.

22. In the financial year ending 30 June 2023, PrimePort Timaru recorded the following trade statistics:[2]

Ship Visits pa:	421 vessels (excluding Cruise)
Bulk trades	2M tonnes (import and export)
Containers:	80,000 Twenty-foot Equivalent Units (TEU)
Cruise:	14 vessels.

23. As can be seen from these trade statistics the Port is strategically important import / export transport infrastructure for the Mid and South Canterbury Region. It provides regional customers direct economic benefits for bulk imports and exports.

24. The location of the Port to Mid and South Canterbury forestry plantations, meat processing plants, dairy factories and fish processing plants provides an economic transport route to New Zealand and global markets with a lower CO^2 emission rate per Net Tonne-Kilometres (CO^2/NTK) than alternative transport options i.e., road and/or rail to Port Chalmers or Lyttelton.[3]

25. Agricultural and construction inputs to the Mid and South Canterbury region such as stock feed, fertiliser, steel and cement are imported via the Port

[1] "The contribution of primary sector exports from Timaru and South Canterbury to New Zealand": Benje Patterson April 2023.
[2] PrimePort Timaru Annual Report 2023
[3] Measuring Emissions: a detailed Guide 2020 (Ministry of Environment)

which enables a low-cost and low carbon footprint delivery to regional customers.

26. Petroleum products imported direct to the Port enables low-cost fuel supply to the region.

27. The Timaru economy benefited by approximately $2.8M during the 2022/23 cruise season when 14 cruise ships visited the port. This figure is expected to grow by almost $1m for the 2023/24 cruise season.[4]

28. Timaru Port provides a unique and essential transport service for the South Island as it is the only central South Island port capable of accepting oversized cargoes including power station transformers, wind farm turbines and other large machinery and components.

29. The Port also provides a major source of employment within the region: -

    (a) PrimePort Timaru directly employs approximately 65 staff.

    (b) An estimated 3,000 people (excluding PrimePort administration staff and visitors) have, as part of their employment, had cause to regularly work within the Port Operating Area in the past 12 months. A large portion of this number would reside within the Timaru District which had approximately 26,000 filled jobs in March 2020.[5]

    (c) There have been an estimated 300,000 worker entries to the Port in the past 12 months. This figure includes stevedores and other port workers not employed directly by PrimePort, transport operators, repairs and maintenance contractors (for vessels and port assets), construction workers, providores and other suppliers, most of whom live in the South Canterbury area. Some of these workers, such as truck drivers, may only be visiting the Port for an hour at a time while others may be working a full day. Assuming an average 4 hours on site per visit this would suggest that the equivalent of 600 FTE workers (as a minimum) gain direct employment from working inside the Port gates in any year (this does not include related off-site suppliers and business support staff).

[4] Venture Timaru Web-Site – media release 18/10/2023
[5] (*Timaru District Economic Development Strategy: Venture Timaru Sept 2021*)

30. If the Port was unable to operate in an economically efficient and effective manner, or was forced to restrict its operations, importers and exporters will consider alternative supply chain transport options i.e., rail and/or road transport of cargoes through either Port Chalmers or Lyttelton Port, which would result in:

(a) an increase in the transport costs of export products and reduce supply chain efficiencies. This would significantly impact the local agriculture (meat and dairy) and forestry sectors and the local economy.

(b) an increase in the transport costs of imported products and increase the costs of bulk products such as stock feed and fertiliser, petroleum products, construction steel and cement. These increased costs would be passed onto end customers in the region.

(c) an increase in the overall "transport" carbon footprint. Goods would travel by road or rail between Timaru and the other port of choice. Studies indicate that in general cargo vessels have a lower CO^2/NTK emission rate than rail and a significantly lower rate than road transport options.[3]

31. PrimePort Timaru also plays an important role in the community supporting various community project initiatives, sports and recreational activities including: -

(a) Sponsoring the annual open water swim event which involves halting vessel movements in and out of the Port while the event takes place.

(b) Sponsoring the "Hadlow to Harbour" race, the "Kids Day Out" variety concert and lead sponsor of the Timaru Christmas Parade.

(c) Providing "Homelink Road Safety" workbooks for primary schools in the region.

(d) Providing a floating fishing pontoon in a safe location within the protected harbour for "Taking Kids Fishing"

(e) Employing local engineering students over their summer holidays so they can gain their required engineering field experience whilst living from home.

(f) Other community projects recently supported by PrimePort includes signage for walkways around Caroline Bay and South Beach; and providing memorabilia items used during the recent Timaru District Council (TDC) cycleway trials.

32. PrimePort supports local environmental projects including:

(a) Providing rocks for penguin nest areas at the end of Talbot Street.

(b) Maintaining the penguin nesting rock pile on the Eastern Breakwater and constructing a dog proof and penguin proof fence at rear of South Beach Penguin Colony.

(c) Maintaining penguin proof fencing around the Log Yard areas.

33. At a national level, the Port is an entity recognised as a “Lifeline Utility” (Part A Schedule 1 of Civil Defence Emergency Act) and the Proposed Plan appropriately recognises the importance of the Port to the region by defining the Port as “Regionally Significant Infrastructure”.

34. In the event of a failure of the Waitaki and Rangitata river bridges during a major Alpine Fault rupture (AF8) event or major flood event (such as the 2019 floods which closed all bridges across the Rangitata river) Timaru port provides an alternative transport lifeline for essential goods to the region.

35. While I understand that the definitions of "*Lifeline Utility*", "*Regionally Significant Infrastructure*" are not the subject of this hearing, Strategic Directions objective SD-08 refers to and recognises the Port through these defined terms. PrimePort Timaru and TDHL agree with objective SD-O8 specifically recognising the importance of the Port through these defined terms. In particular, PrimePort Timaru and TDHL agree with objective SD-O8 specifically:

(a) recognising the benefits of the Port; and

(b) enabling its safe, efficient and effective establishment, operation, maintenance, renewal, upgrading and development while

appropriately managing adverse effects, including reverse sensitivity effects.

36. PrimePort Timaru and TDHL share the joint interest in ensuring the Proposed Plan as a whole is drafted to enable the efficient and effective development and operations of the Port and its supporting and related activities within PORTZ, and to recognise the unique environment and functional requirements of Port operations and its associated activities within the District.

THE CURRENT ACTIVITIES OF THE PORT, AND IN THE PORTZ

37. The Port is a 24/7 operation that generally operates 365 days of the year. The port operating area encompasses a 70+Ha site (land and harbour) which is fully security fenced. By way of explanation, I have included references to specific activities occurring within the PORTZ.

38. The main structures comprising the Port infrastructure include:

    (a) Six wharves with multiple berth pockets (of varying depths). Wharves ranging in length from 170 m to 470 m.

    (b) Inner and outer harbour breakwaters. Eastern breakwater and spurs.

    (c) Storage and operating areas include: Container Terminal (wharf & terminal -10 Ha) Log Yard (6Ha) and general yards

    (d) Inner harbour vessel turning basin and navigation channel

    (e) Administration offices,

    (f) Various other buildings and storage facilities

39. Typical Port activities include:

    (a) *Vessel navigation (pilots), tug operations and mooring of vessels*.

    (b) *Container vessel loading and unloading (North Mole Wharf).*

    Container vessels typically visit twice a week and typically stay in port 12-24 hours. Every hour in port or waiting offshore costs the vessel thousands of dollars so it is vitally important that the Port is operated efficiently.

Stevedores operate shore side Liebherr cranes and unload containers from the container vessel onto the wharf itself where they are picked up by reachstackers or forklifts and either stacked in the terminal awaiting pick-up or customs/MAF inspection or loaded onto trucks for delivery to customers. Loading of vessels comprises the use of reachstackers and forklifts transporting containers to the wharf for crane loading onto the container vessel. Photo 2 below shows container cranes loading and unloading containers from a container vessel (in the distance) and a reachstacker loading containers onto a queue of road trucks (in the foreground).

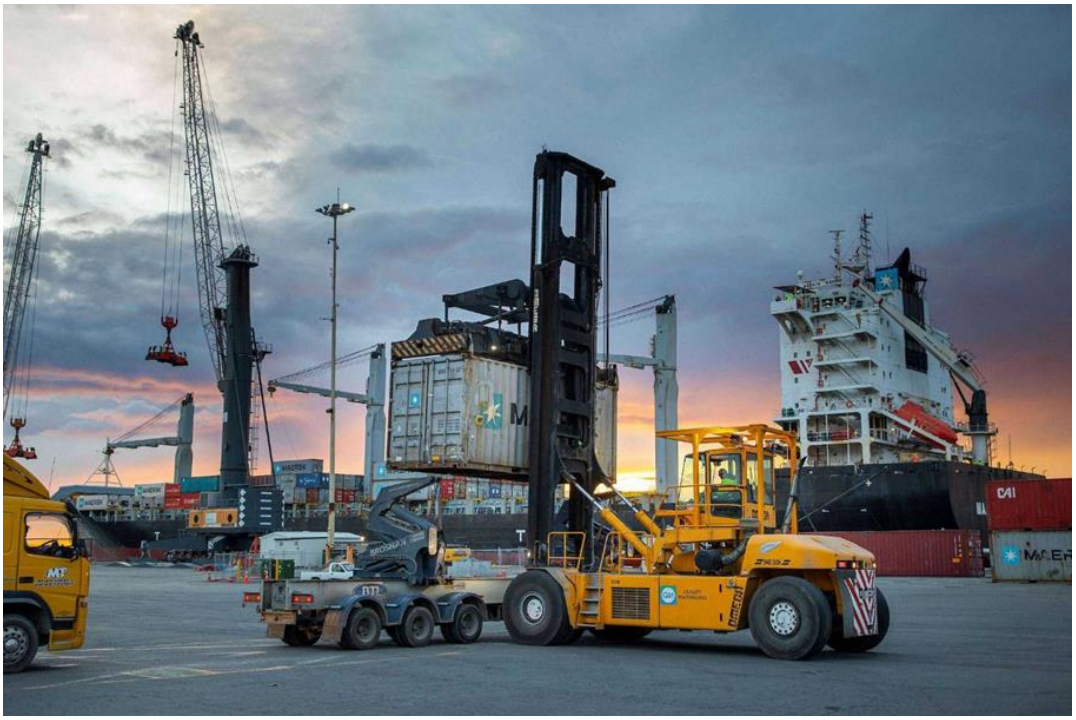

Photo 2 – Container Vessel Operations on the North Mole Wharf

(c) *Road / Rail delivery and uplift of containers (full and empty).*

Between container vessel visits, containers are delivered/uplifted from the terminal by road truck or in some cases by rail.

(d) *Container handling, storage and stacking*

Forklifts transfer containers around the terminal with reachstackers used to stack containers up to six high. Reefer areas provide power for refrigerated containers.

(e) *Construction steel unloading, handling (forklift) and pick up by trucks.*

Steel beams and girders are delivered by ship and unloaded onto the North Mole wharf using shore cranes. This cargo is stored in the terminal until it is picked up by road trucks.

(f) *Logs delivered into Log Yard*

Logs are generally delivered direct from forestry blocks into the log yard at south beach by road truck and trailer units. Prior to unloading in the Port's Log Yard these trucks transit through a covered drive through facility located in the PORTZ where the logs are graded. The log trucks then proceed to the Log Yard where they are run through a "Robotic Scanner Machine (RSM) Building" which records the arrival of each log prior to stacking in rows using log handlers.

(g) Log load-out (No. 1 and No. 1X wharves)

Log handlers load specific rows of logs onto maffi truck and trailer units. These truck units are run through the RSM building to identify each log loaded onto a vessel. Once scanned these truck units are unloaded using ships cranes. Photo 3 below shows logs being loaded onto a log vessel using ship's cranes.

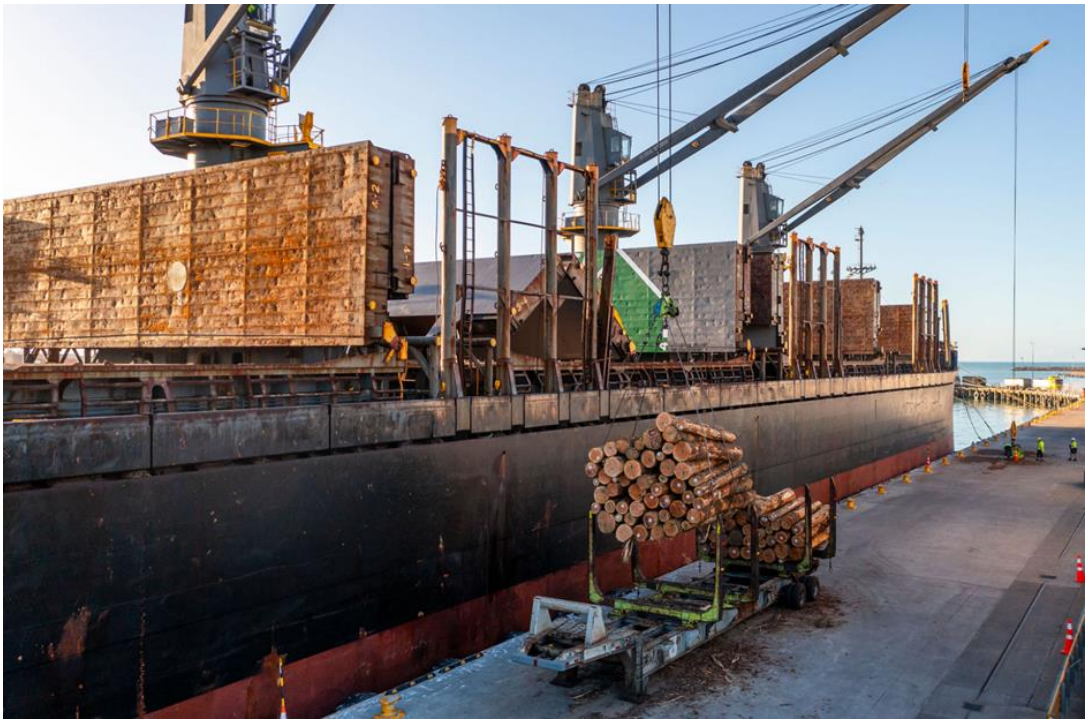

Photo 3 – Log Loading on No.1X Wharf

(h) *Bulk product delivery (No. 1, No. 1X, No. 2 and North Mole Wharves)*

Stockfeed and fertiliser are unloaded from ships into wharfside hoppers, usings clam shell grabs and other. Hoppers then discharge onto road truck and trailer units, which generally transport product via the Port zone weighbridge (PrimePort owned) to storage warehouses (these are generally not located in the PORTZ).

Photo 4 – Bulk Product Loaded onto Road Trucks (via Hoppers) – No.1X Wharf

(i) *Petroleum products and food grade chemicals (No.1X wharf)*

Tankers bring various liquid products into the port. These products are pumped from the tanker via steel pipelines located under roads to storage tanks located within the PORTZ. These storage facilities are in some cases located up to 1 km away from the wharf. The petrochemical storage tanks have been sized to provide adequate fuel storage in an emergency.

(j) *Bulk Cement (No. 2 Wharf)*

International cement vessels deliver bulk cement. Custom built rail mounted vacuum pumps located on the wharf pump cement from the ship into the dome silo.

A coastal vessel is then used to transfer smaller batches of cement for distribution to other ports around NZ. Cement road tankers are also used to supply the regional market as far as Queenstown and parts of the West Coast. Photo 5 below shows an international

cement vessel unloading on the No.2 Wharf. In the foreground a dredge is relocating to a new work area in the port.

Photo 5 – International Cement Vessel – No.2 Wharf.

(k) Fishing (No.1, No. 1X, No. 3 and Fishermans Wharves)

Timaru Port is the second largest fishing port in New Zealand. Large ocean-going fishing vessels drop off their catch for further processing and distribution. Vessels are re supplied, fishing nets and equipment are replaced, and new crews taken on before departure. Typical wharf activity involves Hi-Ab cranes, large mobile cranes and forklifts.

(l) Delivery of Oversize Cargoes (North Mole)

Timaru is a critical South Island port for handling oversize cargoes such as wind turbines, super transformers and other machinery. Neither Port Chalmers nor Lyttelton Ports are able to accept oversize cargoes due to access constraints from those ports.

Photo 6 – Oversize Cargo (Timber Drying Racks) – North Mole Wharf

(m) Other Port Activities include:

i. Ship lay-up, repairs and maintenance (No.3 Wharf)

ii. Wharf repairs and maintenance activities (including an on-going program of driving replacement piles, replacing beams and deck repairs).

iii. Hardstand and Road surfacing and repairs.

iv. Pipeline: testing and certifications, repairs and maintenance, replacement.

v. Hazard mitigation works: repairing breakwater (and wharf buttress) storm damage using large armour rock or similar and extending breakwaters to prevent navigation channel infill.

vi. Asset demolition and construction.

vii. Dredging activities.

viii. Reclaim and Site Development Works.

ix. Cruise visitor transit.

x. Construction and assembly of structures prior to load-out through the port. An example of this would be the prefabrication and loadout of Antarctic New Zealand's new Scott Base Buildings project planned to commence in 2024.

xi. Delivery or pick up of oversize and overweight loads such as transformers or wind turbines which physically cannot be transported through some NZ ports.

40. Other activities that are undertaken within the wider PORTZ are:

(a) Container Storage and Repairs

(b) Ship maintenance, repairs and survey contractors

(c) Off Site storage of plant and equipment for port contractors/operators

(d) Cool and Cold Stores

(e) Fishing industry storage of nets etc

(f) Storage, handling and distribution of bulk petroleum and other liquid products.

ANTICIPATED FUTURE ACTIVITIES OF THE PORT, AND IN THE PORT ZONE

41. There is no certainty as to future Port configuration and what Port operations will look like in the future. Wharf and breakwater infrastructure are very expensive to construct so will likely be similar to today albeit replaced or repaired with more resilient materials. However, future shoreside activities and corresponding assets including buildings, loading and unloading equipment, storage facilities and hardstand areas are harder to predict.

42. Ports operate in a dynamic economic environment and are expected to be flexible and agile and able to quickly respond to changing customer demands. In the past 30 years the Port's operations and storage facility layout have changed dramatically in response to increased vessel size, changes in products imported and exported and customer demands.

43. Looking to the future, the Port Zone is likely to see more cool/cold stores servicing the export market. The Port expects to see more cruise vessels

and may see increasing and new bulk goods such as car imports. We may also see the use of more automation and robotics which may change the layout of the Port's wharves and storage areas. It is also possible the "form" in which some of our products are exported /imported will change. For example, log exports may morph into wood chips (requiring different handling and storage methodologies); and as some bulk products increase in value they may be delivered in containers rather than bulk.

44. What is certain, is that when market conditions change the Port and PORTZ will need to respond to new opportunities and threats to ensure it can continue to service the district's primary and secondary producers. This may result in significant changes to the Port layout, the building of new structures and equipment to facilitate loading or unloading of new products and reshaping wharves to handle new vessels or mooring configurations. It is therefore important that the Proposed Plan enables flexible and economic change that adds value to the business and local economy.

45. The current Port development strategy includes: -

(a) being responsive to changing customer needs to maintain and grow the business;

(b) minimising product processing within the Port operating area and focusing on core operations relating to the unloading and loading of vessels and storage of some cargoes like cement which require a short-term storage facility close to the wharf before distribution.

(c) where sensible to do so, non-core Port operations such as warehousing should be located in the PORTZ or further afield.

(d) petrochemical and other bulk liquid storage should be located within the PORTZ with product pipelines running through to the Port; and

(e) repairing existing wharves rather than building new, to reduce capital expenditure (the cost of a new wharf is in the vicinity of $8,000 to $10,000 per m2). A repaired wharf may last only 15 to 20 years and will require on-going maintenance.

46. From an environmental planning perspective, PrimePort is well aware of the potential inundation hazard risk to the Port – the port has a 160-year history at this site. We monitor and record wave characteristics and tide heights

with information going back 20+ years. This enables the port to monitor local sea level rise on a regular basis. Inundation risk, coastal erosion / accretion and related issues will be addressed in greater detail in later hearings.

OPERATIONAL ISSUES AND IMPACTS FROM THE PROPOSED PLAN

47. PrimePort has concerns that certain aspects of the Proposed Plan have the potential to constrain operations and hinder growth.

48. Of relevance to Hearing A, that includes strategic objectives addressing public access to the coastal marine area (SD-O10), and reverse sensitivity effects (SD-O8). Ms Seaton's evidence addresses those objectives, and the proposed definition of "reverse sensitivity" in detail. However, I provide the following comments on those issues from a Port and TDHL operational perspective.

49. PrimePort and TDHL consider that it is necessary for the Port to be exempted from the provision of public access to and along the coastal marine area. The main reasons being:- Operational efficiency; health and safety in the Port operating area; New Zealand Customs Service rules, regulations and procedures; and Ministry of Agriculture and Fisheries (MAF) inspection and quarantine requirements.

    (a) *Health and Safety* – within the Port operating area[6], (this comprises all areas within the fenced port security zone) including all wharves, breakwaters, hardstand and terminal areas, storage yards and access roads). In these areas large cranes, heavy forklifts, truck and trailer units and other heavy plant and machinery are constantly operating. These confined areas are very high-risk sites and only essential fully trained and inducted staff, customers and contractors are allowed within these areas at any time. When heavy machinery is operating foot traffic is either not allowed or limited to controlled routes. The risks associated with people being in these environments have recently been highlighted by worker fatalities in the Ports of Auckland and Lyttelton.

[6] Encompassed within Precinct 7 of the Proposed Plan.

It is worth noting that even when a wharf is empty it is a health and safety requirement within the Port that anyone working close to the wharf edge must wear appropriate personal protective/preservation equipment.

(b) *Customs Regulations, Rules and Procedures* – Timaru is an international port and as such vessels and cargoes are subject to the same restrictions as an airport. All people and goods arriving and leaving the Port are required to go through customs control. Once cargo inspections are completed, export cargoes must be stored in fully secured yards and terminals. These areas must be people-proof with security fencing required to ensure there is no unauthorised access to these areas. Security teams are also required to monitor high risk areas and patrol fenced perimeters.

(c) *Ministry of Agricultural and Forestry (**MAF**) Rules and Procedures* – MAF inspect people and goods entering the country to ensure they are free of pests and diseases. For example containers are unloaded from vessels and placed on a hardstand where they may be inspected by MAF. Until a container is cleared by MAF it must be stored in a secured area.

50. In conclusion, public access to wharves, hardstands, container and log yards, inner port access roads and other core port operating areas, for the reasons described, will not be permitted.

51. Although access through the operating Port will not be permitted, PrimePort currently enables coastal access along the South Beach foreshore for pedestrians through its unfenced PORTZ land in the South Beach area between Talbot Street to the end of the Eastern Breakwater. In future as the Port expands and security fence lines are relocated to encompass some of this land this access will be moved closer to the ocean, but pedestrian access is likely to be maintained (when safe to do so). The Port has also constructed a small fishing pontoon within the port area between the outer breakwater (north) and the Fishermans wharf for a “Take Kids Fishing” experience.

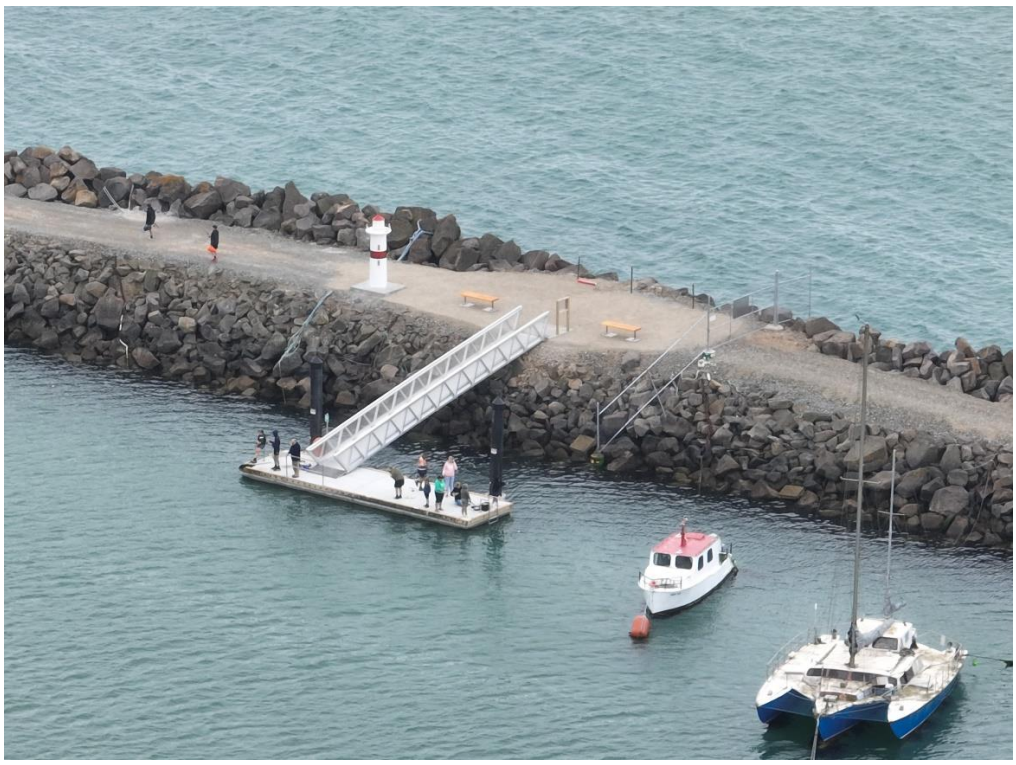

Photo 7 – "Take Kids Fishing" Pontoon

52. Regarding reverse sensitivity effects, PrimePort and TDHL are also concerned at the potential for reverse sensitivity effects to restrict or prevent existing and future Port operations and supporting industrial activities in the PORTZ, if they are not adequately addressed in the Proposed Plan.

53. Our concerns particularly include potential noise and lighting reverse sensitivity issues but may also include effects relating to dust and odour, for example. These issues will be addressed in greater detail at later hearings, but I note the following now:

    (a) *Noise***:** Port operations require heavy machinery to operate 24 / 7 and the Port's close proximity to the Timaru township exposes the Port to potential reverse sensitivity issues relating to noise. It is vital that the Port and PORTZ are enabled to operate at their current noise levels.

    (b) *Lighting*: When working at night the Port (and other associated industrial activity within the PORTZ) requires effective lighting with lighting intensity determined by the activity being illuminated as detailed in Health and Safety guidelines for the activity. Within the Port this may range from 40 lux average in a container terminal where

machinery is operating but people are not working on the ground to 50 lux average along a wharf frontage where moorings teams and other operators operate on foot. The level of illumination required is generally considerably greater than would be compatible with, for example, a residential area.

54. It is important for reverse sensitivity issues to account for the need for the Port and its supporting and related activities to be flexible, agile and able to quickly respond to changing customer demands as part of a dynamic economic environment. As has already occurred in the past 30 years, Port operations and layouts can change dramatically in response to changes in vessel sizes, products imported and exported and customer demands. Activities within the PORTZ can also change and respond as the economic environment changes, for example in 2015 a cement terminal was constructed at the base of No.2 wharf requiring a massive dome silo, cement handling machinery, compressors etc. Prior to this date cement was not a significant import for the Port. More recently the Scott Base project has been established on a large section of port land to construct buildings for loadout to Antarctica.

55. It is vital for ongoing operations of the Port and its supporting and related activities to have the flexibility to carry out approved activities, including to develop, relocate, expand, upgrade, or otherwise change permitted activities within the PORTZ without being compromised by the establishment of sensitive activities in the meantime. Accordingly, I support amendments recommended by Ms Seaton to the "reverse sensitivity" definition, to better protect current and future Port and supporting activities in the PORTZ.

CONCLUSION

56. For the reasons set out above and in the evidence of Ms Seaton, I support retention of proposed Objective SD-O8(iv), and its amendment to explicitly acknowledge reverse sensitivity effects.

57. I consider it is appropriate to amend objective SD-O10 as set out in Ms Seaton's evidence, to enable the exclusion of the Port of Timaru from the provision of public access to and along the coastal marine area within the Port operating area for public safety reasons and Customs and MAF rules

and regulations requiring public exclusion from certain operating and storage areas.

58. I support the amendments recommended by Ms Seaton to the “reverse sensitivity” definition, to better protect current and future Port and supporting activities in the PORTZ.

Date: 22 April 2024

Frazer Munro

Attachment 1: PrimePort and TDHL Land within the PORTZ

TDHL Property Tour 26 November 2020